

United States Courts  
Southern District of Texas  
FILED

MAR 7 2020

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

Vs.

Krystal Marie Chapman  
Armando Alonzo Jr.

CRIMINAL COMPLAINT

Case Number: 2:20-MJ-849

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about March 6, 2020 in Kenedy County, in the Southern District of Texas, defendant, **Krystal Marie Chapman**  
**Armando Alonzo Jr.**

each aiding, abetting and assisting one another, did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324  
I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:  
Official Title

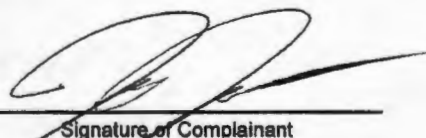
See Attached Affidavit of U.S. Border Patrol Agent

James Jewell

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

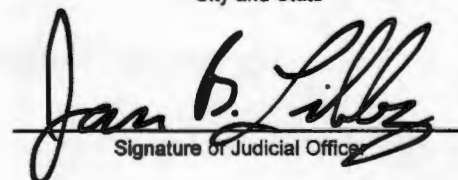
Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:

  
Signature of Complainant  
**James Jewell**  
Printed Name of Complainant

March 7, 2020  
Date

at Corpus Christi, Texas  
City and State

Jason B. Libby U.S. Magistrate Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer

### **AFFIDAVIT**

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

#### **FACTS/DETAILS:**

On March 6, 2020, at approximately 6:25 a.m., a black Mazda 3 approached the primary inspection lane of the Sarita checkpoint for an immigration inspection of its occupants. When the vehicle came to a stop at the primary lane, the primary agent asked the driver, later identified as Krystal Marie CHAPMAN, if she was a United States citizen. CHAPMAN stated that she was. The front passenger, later identified as Armando ALONZO Jr., also stated he was a United States citizen. The agent then asked the rear passenger, later identified as Veronica ALEMAN-Lopez, if she was a United States citizen. ALEMAN replied in broken English, "Yes, U.S. citizen." The agent noticed how ALEMAN seemed nervous and avoided making eye contact with him when she spoke. The agent then asked ALEMAN where she was born and what city she lived in. ALEMAN then replied, "Yes, Corpus." When asked what her address was, ALEMAN answered, "Mission, McAllen, and Edinburg." At that point, the agent was unsatisfied with ALEMAN's responses in regards to the questions concerning her immigration status. The vehicle was then sent to the secondary inspection area. Once there, ALEMAN admitted to Border Patrol Agents she was an illegal alien from Mexico.

At that time, CHAPMAN and ALONZO were placed under arrest for alien smuggling and ALEMAN was placed under arrest for being illegally present within the United States. All of the subjects were then escorted inside the immigration checkpoint where they were read their Miranda Rights in the language of their preference. All subjects signed stating they understood their rights and were willing to make a statement without a lawyer present.

#### **PRINCIPAL STATEMENT: (Krystal Marie CHAPMAN)**

CHAPMAN stated her common-law husband ALONZO told her they were going to Corpus Christi, Texas to try and find a car. CHAPMAN stated ALONZO's father had called in the morning to ask ALONZO if they would give a ride to a female friend (ALEMAN). CHAPMAN claimed her father-in-law arrived at her house earlier today (March 6, 2020) in a car with ALEMAN. CHAPMAN stated they were going in a car lent to them by a friend of the father-in-law. CHAPMAN stated once she and her husband were in the car with ALEMAN, she asked ALEMAN where she was going. CHAPMAN stated ALEMAN did not speak English well, but told her she was going to visit her sister in Corpus Christi. CHAPMAN stated since she does not speak Spanish, she did not make any further communication with ALEMAN.

**PRINCIPAL STATEMENT: (Armando ALONZO Jr.)**

ALONZO stated he had received a call the night before (March 5, 2020) from a friend asking him to cross a female (ALEMAN) through the checkpoint. ALONZO had been told he would be paid with a vehicle. ALONZO stated he did not know at the time if ALEMAN was illegal, but he assumed she was. ALONZO stated on today's date (March 6, 2020) his friend arrived in the black Mazda 3 to pick him up. ALONZO stated he woke up his wife CHAPMAN to drive for him because she was white and a better driver. ALONZO said he and his wife got in the car with his friend and drove to the friend's house to pick up ALEMAN.

ALONZO stated when they arrived at the friend's house, he saw his cousin Salvador TORRES (refer to Border Patrol Event KIN2003000020) was there waiting because he was going to be crossing ALEMAN's husband (Ernesto ESTRADA-Alcantar) through the checkpoint an hour after ALONZO crossed ALEMAN. ALONZO stated a black pickup truck arrived with ESTRADA and an unknown male driver pulled up to them. ALONZO stated his cousin TORRES went up to the pickup, then came back and told ALONZO, "I got paid and I'm leaving." ALONZO said he did not know where his cousin took ESTRADA because he was supposed to leave an hour after him.

ALONZO stated the same unknown male driver then brought ALEMAN. ALONZO stated ALEMAN got into the vehicle and that CHAPMAN went to talk to the unknown male driver. ALONZO stated the man told CHAPMAN they were supposed to drop ALEMAN off at the nearest Wal-Mart in Kingsville, Texas. ALONZO, CHAPMAN, and ALEMAN all then got into the vehicle and they proceeded to drive north. During the drive, ALONZO talked to ALEMAN and confirmed she was an illegal alien. After being arrested and then transported to the Kingsville Border Patrol station, ALONZO stated CHAPMAN handed him \$200 the male driver had given her to use for snacks. ALONZO said he was unaware of the money and believed the vehicle would be the only payment.

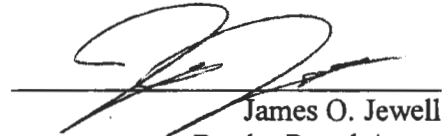
**MATERIAL WITNESS STATEMENT: (Veronica ALEMAN-Lopez)**

Having crossed illegally into the United States on January 8, 2020, ALEMAN stated she and her boyfriend ESTRADA wished to travel further north into the country to find work. A friend helped put her in contact with a smuggler who picked ALEMAN and ESTRADA up at their apartment and took them to his house. ALEMAN stated ESTRADA paid the smuggler \$4,700 as a first payment and the rest would be paid when they crossed the checkpoint. The smuggler also told her common questions Border Patrol Agents would ask as well as the answers she would need to give. The smuggler told ALEMAN that she and ESTRADA would be crossed in separate vehicles. The smuggler took ALEMAN to an unknown house where she saw the three subjects (CHAPMAN, ALONZO, and TORRES) who would be transporting them through the checkpoint. ALEMAN stated the original smuggler talked to each of these subjects and paid them an unknown amount of money. The smuggler told ESTRADA to get into the pickup with TORRES while she got into the vehicle with CHAPMAN and ALONZO. While driving,

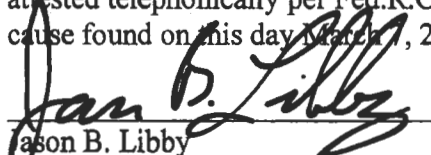
ALEMAN stated ALONZO went over the questions that agents would ask her, but mainly spoke English with CHAPMAN. ALEMAN was able to positively identify TORRES, CHAPMAN, and ALONZO via photo line-up.

**DISPOSITION:**

The facts of this case were presented to Assistant United States Attorney Office who accepted Armando ALONZO Jr. and Krystal Marie CHAPMAN for prosecution of 8 USC 1324, Alien Smuggling. Veronica ALEMAN-Lopez will be held as a Material Witness.

  
James O. Jewell  
Border Patrol Agent

Submitted by reliable electronic means, sworn to, signature  
attested telephonically per Fed.R.Crim.P.4.1, and probable  
cause found on this day March 7, 2020

  
Jason B. Libby  
United States Magistrate Judge